



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

0000011

141573

REPLY TO THE ATTENTION OF

DT-8J

MEMORANDUM

DATE: February 24, 2000

TO: Thomas Martin,
Associate Regional Counsel
Region 5, U.S. EPA

FROM: Steve Johnson, Geologist
Toxic Programs Section
Waste, Pesticides and Toxics Division
U.S. EPA

SUBJECT: ARARS compliance, Sauget TSCA Landfill

I have reviewed the initial report prepared by Solutia Inc. for on-site disposal of approximately 50,000 cubic yards of PCB-bearing remediation waste under a Superfund Unilateral Administrative Order, Docket No. V-W-99-C-554. For the reasons cited below, the proposal is in substantial compliance with the performance-based disposal requirements of the Toxic Substances Control Act at 40 CFR 761.61(b)(2)(I).

I find that Solutia's proposal for on-site disposal of PCB bearing dredged material meets the requirement that operation of the chemical waste landfill will not present an unreasonable risk of injury to health or the environment from PCBs if it is built according to plan, because of the following proposed design specifications :

- 1) the construction plan includes the following items:
 - a) above 100 year flood plain
 - b) above grade construction
 - b) two double thick synthetic membrane liners,
 - c) full membrane envelopment
 - d) gravel armoring of cap and berm
 - e) venting and weighting of cap to prevent flotation
 - f) a cap/berm that will survive complete flood inundation